

Rules for a Class A station with respect to a second adjacent channel Class B station is 113 kilometers. As explicitly stated in §73.215(c) of the Commission's Rules:

Applications submitted for processing pursuant to this section are not required to propose contour protection to any assignment, application or allotment for which the minimum distance separation requirements of §73.207 are met, and may, in the directions of those assignments, applications and allotments, employ the maximum ERP permitted by §73.211 for the standard eight-radial antenna HAAT employed.

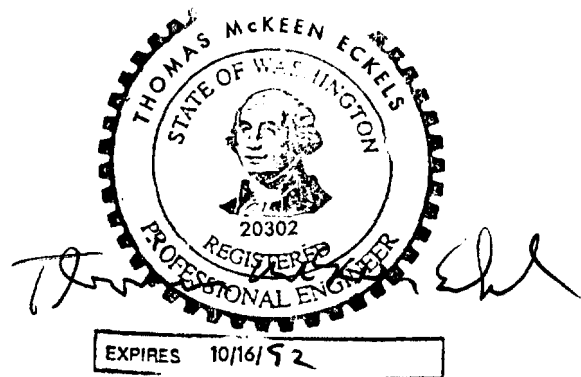
The interference study submitted by Deas' technical witness is simply irrelevant.

4. "The accuracy of the HBI RFR study is in question."

As stated clearly in the HBI amendment and the Amendment Engineering Statement, apparently filed simultaneously with the amendment, the NIER calculations performed by HBI's consulting engineer were based on isotropic antenna pattern assumptions and the power density calculation formula contained in OST-65, using the height of the antenna above ground as the "slant distance" to produce an estimate of the power density levels produced on the ground by HBI's proposal. These assumptions are very conservative, and produce a "worst case" estimate of the maximum power density levels likely to be produced on the ground by HBI's proposed operation. The only other broadcast station operating at the proposed HBI site, KMGG(FM), Monte Rio, California, has a construction permit (BPH910930IF) to increase power to maximum Class B1 facilities at its present Class A site, located approximately 30 meters from the proposed HBI site. The maximum power density predicted to occur as a result of the proposed Class B1 operation of KMGG(FM), as shown in the KMGG(FM) application for Construction Permit, is 243.2

$\mu\text{Wcm}^2$ , at a distance of 6 meters from the base of the KMGG tower. This power density level is 24.3% of the applicable RFPG shown in ANSI C95.1-1982. If the maximum power density levels produced by each station were assumed to occur at the same location (which they will not), the worst-case ground level power density resulting from the operation of both FM stations would be  $(243.2 + 143) = 386.2 \mu\text{W/cm}^2$ , or 38.6% of the applicable ANSI RFPG. When the actual downward radiation pattern of the antenna proposed by HBI is taken into consideration, the HBI contribution is reduced significantly below the level predicted using "worst case" isotropic pattern assumptions. The two-way and paging operations at the proposed HBI site are categorically excluded from consideration for purposes of compliance with the requirements of §1.1307 of the Commission's Rules. As demonstrated above and in the HBI amendment, the proposed operation will not produce fields near the ground in excess of the ANSI RFPG levels. Also, as stated clearly in the amendment, the proposed transmitter will be turned off whenever maintenance personnel are required to climb the antenna support structure or to work in the vicinity of the proposed antenna.

July 13, 1992



Thomas M. Eckels, P.E.

Hatfield & Dawson Consulting Engineers

CERTIFICATE OF SERVICE

I, Peter A. Casciato, certify that the following is true and correct:

I am employed in the City and County of San Francisco, California, am over the age of eighteen years, and am not a party to the within entitled action:

My business address is: 1500 Sansome St., Suite 201, San Francisco, California 94111.

On July 16, 1992, I caused the attached Response to Order to Show Cause of Healdsburg Broadcasting, Inc. to be served by causing true copies thereof, enclosed in sealed envelopes with postage thereon fully prepaid, to be placed in the United States Post Office mail box at San Francisco, California, addressed to the following listed people:

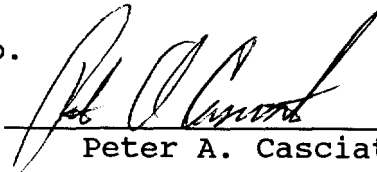
Hon. Edward J Kuhlmann  
Administrative Law Judge  
Federal Communications Commission  
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Washington, DC 20036  
(Federal Express\By Hand)

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